Mr. M. Salvadore Department of Public Service 6 South Court Street Buffalo, New York 14202

Dear Mr. Salvadore:

This refers to your letter of April 15, 1976, in which you ask whether a welder who qualified under 49 CFR 192.227(a)(2) by "making a 12 inch butt weld and a 12 inch inverted tee test" must have a butt weld and a fillet weld cut out to verify his qualifications under Section 192.227(c)(2)(i).

As provided by Section 192.223(b), each welder must perform a qualifying test for the welding procedure to be used. When a welder qualifies under Section 192.227(a)(2), to maintain the qualification, Section 192.229(c) requires that within the preceding six calendar months, the welder must have had at least one weld tested and found acceptable under either Section 3 or 6 of API Standard 1104. Section 192.227(c)(2)(i) requires that a production weld be cut out, tested, and found acceptable in accordance with the qualifying test only if a welder qualifies under Section 192.227(c).

When a welder initially qualifies for more than one welding procedure, <u>to maintain the qualification for a particular procedure</u>, <u>the welder must have a weld using that procedure tested</u>, and <u>found acceptable</u>. A welder need not maintain the qualifications for all the procedures for which the welder initially qualifies in order to weld under a single procedure.

We trust this satisfactorily responds to your inquiry.

Sincerely,

\signed\

Cesar DeLeon Acting Director Office of Pipeline Safety Operations

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Gentlemen:

I am writing to you for a clarification of Part 192.227(2)(i). After initial qualification a welder may not perform welding unless:

- (2) Within the preceding 6 calendar months he has had:
- (i) a production weld cut out, tested and found acceptable in accordance with the qualifying test;

This is my salutation: a welder gets a multiple qualification test by making a 12" butt weld and a 12" inverted tee tests. This is according to API 1104.

I interpret the code to read; the welder would have to cut a fillet weld and a butt weld to verify his qualifications.

Please send me your interpretation as soon as possible.

Thank you,

M. Salvadore

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